

REMARKS

In the Office Action of 5/5/04, the Examiner objected to claim 21 and rejected claims 1-21. In this response, Applicants have amended the specification to correct errors (typos) in the specification. Also, Applicants have amended claims 6, 9, 15, and 17-20, canceled claim 21, and added new claims 22-24. Accordingly, claims 1-20 and 22-24 will be pending in this application.

I. Amendments to the Specification:

In this Amendment, Applicants have amended the specification to correct errors (typos) in the specification. No new matter had been added, as all the corrections are supported by the discussion in the specification and by the illustrations in the figures.

II. Claim Objection

In the Office Action, the Examiner objected to claim 21 as being a duplicate of claim 20. Accordingly, Applicants have canceled claim 21.

III. Rejections Under 35 U.S.C. 102

In Office Action, the Examiner rejected claims 1-4, 6, 8, and 18-21 under 35 U.S.C. 102(b) as being anticipated by Adobe Photoshop 5.0 User Manual, hereinafter Photoshop Manual. Applicants respectfully traverse these rejections.

Claim 1 recites a method for performing color correction on at least one image, said image comprised of a plurality of pixels, said method comprising:

accepting a first vector input from a first color adjustment pad, said first vector input proportionally adjusting a color of pixels of a first selected luminance value in said image; and

adjusting a color of pixels with other luminance values in a manner related to a difference between said first selected luminance value and said other luminance value.

Applicants respectfully submit that the Photoshop Manual does not disclose, teach, or even suggest each limitation of claim 1. For instance, the Photoshop Manual does not disclose, teach, or even suggest the separate operations of accepting a vector input that proportionally adjusts a color of pixels of a first selected luminance value in an image and adjusting a color of pixels with other luminance values in a manner related to a difference between said first selected luminance value and said other luminance value.

On page 117, right column, step 3 (which the Examiner cites), the Photoshop Manual states that “to increase the contrast in an image... If you drag the Input Levels white triangle to 233, pixels with brightness values of 233 and higher (in each channel of the image) are mapped to 255, pixels with lower brightness values are mapped to corresponding lighter values.” Claim 1, however, relates to adjusting the *color* of pixels rather than the contrast of pixels (as claim 1 requires “adjusting a color of pixels”).

Also, the Photoshop Manual does not disclose, teach, or even suggest adjusting the color of pixels with other luminance values (other than a first selected luminance value) in a manner related to a *difference between the first selected luminance value and the other luminance value*, as required by claim 1. In fact, the Photoshop Manual does not disclose, teach, or even suggest adjusting any parameter (color/chrominance, luminance, etc.) of pixels in this manner. In the portions cited by the Examiner, the Photoshop Manual simply states that pixels with lower brightness values are mapped to

corresponding lighter or darker values (page 117, left column, step 3 and page 118, left column). The cited portions, however, do not teach or suggest in what manner the brightness values are mapped to the lighter or darker values and do not teach or suggest adjusting brightness values in a manner related to a luminance difference. Applicants respectfully request that the Examiner specify the portion(s) of Photoshop Manual disclosing the “manner related to a luminance difference” limitation of claim 1.

For the above reasons, Applicants submit that claim 1 is in allowable form. Claims 2-4 are dependent upon claim 1, and thus are also allowable for at least the same reasons as claim 1.

As amended, independent claim 6 recites a method of performing color correction by adjusting luminance values of a set of pixels, the method comprising:

- a) receiving a user input for modifying luminance values of pixels of a first selected luminance value;
- b) based on the user input, modifying a luminance mapping relationship for mapping luminance values; and
- c) using the modified luminance mapping relationship to map original luminance values of pixels to adjusted luminance values in a manner related to a difference between said first selected luminance value and said original luminance value.

Applicants respectfully submit that the Photoshop Manual does not disclose, teach, or even suggest each limitation of amended claim 6. For instance, the Photoshop Manual does not disclose, teach, or even suggest the separate operations of receiving a

user input for modifying luminance values of pixels of a first selected luminance value, modifying a luminance mapping relationship based on the user input, and using the modified luminance mapping relationship to map original luminance values of pixels to adjusted luminance values in a manner related to a *difference between said first selected luminance value and said original luminance value.*

As discussed above, the Photoshop Manual does not teach or suggest adjusting parameters of pixels in a manner related to a luminance difference. Applicants submit that the Photoshop Manual also does not teach or suggest using a modified luminance mapping relationship to map original luminance values of pixels to adjusted luminance values in a manner related to a luminance difference, as required in Claim 6. Applicants respectfully request that the Examiner specify the portion(s) of Photoshop Manual disclosing the “manner related to a luminance difference” limitation of claim 6.

Claims 8 and 18-20 are dependent on claim 6 and are allowable for at least the same reasons as claim 6. Claim 21 has been canceled making the rejection of the claim moot.

IV. Rejections Under 35 U.S.C. 103

In Office Action, the Examiner rejected claim 5 under 35 U.S.C. 103(a) as being unpatentable over the Photoshop Manual in view of Power et al. (U.S. Patent 5,982,924). Claim 5 is dependent on claim 1 and is allowable for at least the same reasons as claim 1.

In Office Action, the Examiner rejected claim 7 under 35 U.S.C. 103(a) as being unpatentable over the Photoshop Manual in view of Barton et al. (U.S. Patent 6,266,103). Claim 7 is dependent on claim 6 and is allowable for at least the same reasons as claim 6.

In Office Action, the Examiner rejected claims 9 and 11-17 under 35 U.S.C. 103(a) as being unpatentable over the Photoshop Manual in view of Sato et al. (U.S. Patent 6,262,817, hereinafter Sato). As amended, independent claim 9 recites a method of performing color correction by adjusting chrominance values of a set of pixels, the method comprising:

- a) receiving a user input for modifying chrominance values of pixels of a first selected luminance value;
- b) based on the user input, modifying a chrominance mapping relationship for mapping chrominance values; and
- c) using the modified chrominance mapping relationship to map original chrominance values of pixels with other luminance values to adjusted chrominance values in a manner related to a difference between said first selected luminance value and said other luminance value.

Applicants respectfully submit that neither the Photoshop Manual nor Sato, alone or in combination, discloses, teaches, or even suggests each limitation of amended claim 9. For instance, neither the Photoshop Manual nor Sato discloses, teaches, or even suggests the separate operations of receiving a user input for modifying chrominance values of pixels of a first selected luminance value, modifying a chrominance mapping relationship based on the user input, and using the modified chrominance mapping relationship to map original chrominance values of pixels with other luminance values to adjusted chrominance values in a manner related to a *difference between said first*

selected luminance value and said other luminance value.

As discussed above, the Photoshop Manual does not teach or suggest adjusting parameters of pixels in a manner related to a luminance difference. Applicants submit that the Photoshop Manual also does not teach or suggest using a modified chrominance mapping relationship to map original chrominance values of pixels to adjusted chrominance values in a manner related to a luminance difference, as required in Claim 9. Sato does not cure the deficiencies of the Photoshop Manual. Applicants respectfully request that the Examiner specify the portion(s) of the Photoshop Manual or Sato disclosing the “manner related to a luminance difference” limitation of claim 9.

Claim 11 is dependent on claim 9 and is allowable for at least the same reasons as claim 9. Claims 12-17 are dependent on claim 1 and are allowable for at least the same reasons as claim 1.

In Office Action, the Examiner rejected claim 10 under 35 U.S.C. 103(a) as being unpatentable over the Photoshop Manual as modified by Sato, and further in view of Barton. Claim 10 is dependent on claim 9 and is allowable for at least the same reasons as claim 9.

V. New Claims 22-24

In this Amendment, Applicants have added independent claims 22, 23, and 24. Independent claims 22, 23, and 24 are computer readable medium claims containing limitations similar to independent method claims 1, 6, and 9, respectively. Accordingly, claims 22, 23, and 24 are patentable over the cited art for the same reasons as stated above for claims 1, 6, and 9, respectively.

VI. Information Disclosure Statement

Accompanying this Amendment is the 1449 form of an Information Disclosure Statement that Applicants are submitting concurrently with but separately from this Amendment. This Information Disclosure Statement lists and provides copies of several additional references for the Examiner's consideration. The Examiner is requested to make these documents of record.

CONCLUSION

Based on the foregoing remarks, Applicants believe that the rejections and objections in the Office Action of 5/5/04 are fully overcome and that the application is in condition for allowance. If the Examiner has any questions regarding the case, the Examiner is invited to contact Applicants' undersigned representative at the number given below.

Respectfully submitted,

STATTLER, JOHANSEN & ADELL LLP

Dated: 9/7/04



Gregory Suh
Reg. No. 48,187

Stattler, Johansen & Adeli LLP
P.O. Box 51860
Palo Alto, CA 94303-0728
Phone: (650) 752-0990 x104
Fax: (650) 752-0995